

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MARYLAND**

HENRY J. CLARKS,

Plaintiff,

V.

EXPERIAN,

Defendant.

Case No.: 8:17-cv-00151-PWG

## NOTICE OF REMOVAL

Pursuant to 28 U.S.C. §§ 1331, 1446, and Local Rule 103.5, Defendant Experian files this Notice of Removal and states as follows:

1. Experian is a defendant in Case Number 050200221142016 filed in the District Court of Maryland for Prince George's County (the "State Court Action").
2. Plaintiff filed his complaint against Experian in the District Court of Maryland for Prince George's County on November 30, 2016. *See* District Court Complaint, attached hereto as **Exhibit 1**. Experian was served with a copy of the Summons and Complaint on December 27, 2016. This Notice of Removal is timely filed pursuant to 28 U.S.C. § 1446, as thirty (30) days have not elapsed since Experian's receipt of the summons or initial pleading setting forth Plaintiff's claim for relief against Experian.
3. The State Court Action includes claims that Experian violated the Fair Credit Reporting Act. See Complaint. Thus this Court has original jurisdiction over the above-captioned action pursuant to 28 U.S.C. § 1331 and 15 U.S.C. § 1681p.
4. This Notice of Removal will be filed promptly in the State Court Action and served upon Plaintiff.

5. Copies of process and pleadings in the State Court Action which have been received by Experian are attached hereto as set forth below.

- Plaintiff's Complaint against Experian, filed in the District Court for Prince George's County on November 30, 2016, attached hereto as **Exhibit 1**.
- Writ of Summons to Experian, issued by the District Court for Prince George's County on December 20, 2016, attached hereto as **Exhibit 2**.
- Notice from District Court for Prince George's County Setting Trial Date, attached hereto as **Exhibit 3**.
- Plaintiff's Complaint against CT Corporation, filed in the District Court for Prince George's County on August 19, 2016, attached hereto as **Exhibit 4**.
- Plaintiff's Line Dismissing CT Corporation, filed in the District Court for Prince George's County on December 30, 2016, attached hereto as **Exhibit 5**.

WHEREFORE, Experian removes the subject action from the District Court for Prince George's County to this United States District Court for the District of Maryland.

Dated: January 17, 2017

SHULMAN, ROGERS, GANDAL,  
PORDY & ECKER, P.A.

By:



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*Counsel for Experian*

**CERTIFICATE OF SERVICE**

I hereby certify that a copy of the foregoing Defendant's Notice of Removal and Defendant's Civil Cover Sheet was served by first class mail, postage prepaid, on this 17th day of January, 2017, to:

Henry J. Clarks  
7 Mattawoman Way  
Accokeek, MD 20607

  
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Joy C. Einstein